

# **EXHIBIT 3**

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA**

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

JEFFREY BROWN

**Petitioner**

V<sub>e</sub>

## **HALLIBURTON ENERGY SERVICES, INC.**

## **Respondent**

CJ-2022-471

NO: 50

JAN 31 2022

RICK WARREN  
COURT CLERK

**PETITION FOR NEGLIGENCE, CARELESSNESS AND  
RECKLESSNESS AND DEMAND**

COMES NOW the Petitioner, Jeffrey Brown, by and through his attorney Bill D. Reynolds of Caddell Reynolds, P.A., and for his Petition against the Respondent, Halliburton Energy Services, Inc., states:

1. Petitioner currently is, and was at the time of the injury described below, a citizen and resident of Crawford County, Arkansas.

2. At all times relevant, Respondent, Halliburton Energy Services, Inc. (hereinafter "Halliburton"), is a Delaware for-profit corporation organized and licensed to do business in the State of Oklahoma (Filing No. 2300166578), whose Registered Agent is Capitol Document Services, Inc. with the Registered Address of 1833 South Morgan Road, Oklahoma City, Oklahoma County, Oklahoma 73128.

3. This Court has jurisdiction over the parties and subject matter hereto, and venue is proper.

4. The incident in question took place in Canadian County, Oklahoma.

5. Petitioner, at all times relevant hereto, was employed as a driver for Swaggin Wagon, Inc.

6. On April 29, 2020 at approximately 6:00 a.m., Petitioner drove a Peterbilt semi-truck and trailer to Respondent's location in Calumet, Oklahoma. Upon arriving, Petitioner brought the truck to a complete stop for Respondent to unload the contents of Petitioner's trailer. Respondent attempted to unload a 40,000 lb. piece of equipment from the trailer of the Peterbilt semi-truck using a forklift. The manner in which Respondent attempted to unload the equipment caused the whole truck to lean towards the passenger side, lifting the driver side and the Petitioner off the ground by several feet. Once the Respondent finished unloading the equipment, Petitioner's cab slammed back down to the ground, and Petitioner suffered serious injuries as a result.

7. At the above date and time, Respondent's operation of their equipment in unloading Petitioner's vehicle of the 40,000 lb. load was conducted in such manner as to be careless, negligent, and reckless creating a substantial and unnecessary risk to the Petitioner. The actions of Respondent in failing to properly unload such heavy equipment is so reckless as to warrant punitive damages, and said punitive damages should be awarded to Petitioner against Respondent.

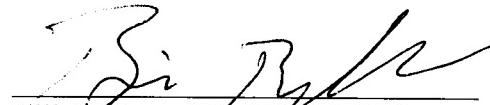
8. As a direct and proximate result of the negligence, recklessness and carelessness of Respondent, Petitioner suffered serious injuries; required medical care and treatment for which he has incurred charges; has endured pain, suffering, and mental anguish in the past which shall endure to the future; and has sustained permanent injuries. Compensatory and punitive damages should be awarded against Respondent and any and

all other relief, including attorney's fees and pre-judgment interest, to which Petitioner may show himself entitled.

9. Pursuant to Okla. Stat. Ann. tit. 12, § 2008(A)(2) Petitioner demands relief for damages in the sum and amount in excess of the minimum amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code.

WHEREFORE, PREMISES CONSIDERED, Petitioner demands judgment against Respondent in the sum and amount in excess of the minimum amount required for diversity jurisdiction, for compensatory and punitive damages, and for all other just and proper relief to which he may show himself entitled.

Respectfully submitted,



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